

To: aginn@blm.gov[aginn@blm.gov]
From: Anita Bilbao
Sent: 2017-05-19T16:22:50-04:00
Importance: Normal
Subject: Fwd: Bears Ears Executive Summary and Initial Data Request
Received: 2017-05-19T16:23:00-04:00
[mime-attachment.html](#)
[ATT00001.htm](#)
[New information requested on EO 13792 Monuments Review BENM.docx](#)
[ATT00002.htm](#)
[Initial Data Request Related to Review of National Monuments BENM \(1\).docx](#)
[ATT00003.htm](#)
[mime-attachment.html](#)
[ATT00004.htm](#)
[New information requested on EO 13792 Monuments Review BENM.docx](#)
[ATT00005.htm](#)
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[ATT00006.htm](#)

Sent from my iPhone

Begin forwarded message:

From: Anita Bilbao <abilbao@blm.gov>
Date: May 19, 2017 at 2:19:45 PM MDT
To: ajossie@blm.gov, acurtis@blm.gov, aginn@blm.gov, l50porte@blm.gov,
 tashcrof@blm.gov, cstaszak@blm.gov
Cc: eroberso@blm.gov, mjrichardson@blm.gov, lbird@blm.gov,
 rrsutherland@blm.gov, khoffman@blm.gov, jmendez@blm.gov
Subject: Fwd: Bears Ears Executive Summary and Initial Data Request

FYI transmitted today. Will share any other info sent. Thanks for everyone's excellent work pulling this together! Anita

Sent from my iPhone

Begin forwarded message:

From: "Moore, Nikki" <nmoore@blm.gov>
Date: May 19, 2017 at 1:48:46 PM MDT
To: Kathleen Benedetto <kathleen_benedetto@ios.doi.gov>, Michael Nedd
 <mnedd@blm.gov>, John Ruhs <jruhs@blm.gov>
Cc: Peter Mali <pmali@blm.gov>, "McAlear, Christopher" <cmcalear@blm.gov>,
 Sally Butts <sbutts@blm.gov>, Timothy Fisher <tjfisher@blm.gov>,
 Anita Bilbao <abilbao@blm.gov>, Edwin Roberson
 <eroberso@blm.gov>, Kristin Bail <kbail@blm.gov>, Aaron Moody

<aaron.moody@sol.doi.gov>

Subject: Bears Ears Executive Summary and Initial Data Request

Hi,

Please find attached the Executive Summary and Responses to the Initial Data Request for the Bears Ears National Monument. Also, attached is a zip folder with all of the supporting documents. The summary, response, and data are the documents that are available on the google drive that the monument review team has been accessing and editing. Only the executive summary and possibly some information from the data request summary will be included in the draft report to the Secretary. However all of raw data provided will remain available in the zip and google folder. Lastly, new information was requested on EO 13792 that Utah has provided. This information needs to be provided in a separate document and cannot go on the google drive. Randy has requested this information in a separate email - the document is titled "New information requested on EO..."

Once you review, I will let Randy know today that BLM has completed the initial data request for Bears Ears and Grand Staircase. I'll send Grand Staircase shortly.

Thank you!

Nikki Moore
Acting Deputy Assistant Director, National Conservation Lands and Community Partnerships
Bureau of Land Management, Washington D.C.
202.219.3180 (office)
202.740.0835 (cell)

**New information requested on Executive Order on the Review
of Designations Under the Antiquities Act**

BLM-Utah Responses to Additional Questions

1) Designated wilderness areas (name, acreage), Wilderness Study Areas (name if there is one, acreage, type), and/or areas managed to preserve wilderness or roadless characteristics that are not WSAs.

- a) There is no BLM-administered designated wilderness within BENM. The US Forest Service manages the Dark Canyon Wilderness.
- b) BLM manages 11 WSAs totaling 380,759 acres within BENM.
 - Bridger Jack Mesa – 6,333 acres
 - Butler Wash – 24,277 acres
 - Cheesebox Canyon – 14,831 acres
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 - *WSA/ISA acres listed are the total BLM-administered surface acres from the Utah Statewide Wilderness Study Report, October 1991. GIS calculations would vary.*
- c) There are ~48,800 acres within 4 areas (Dark Canyon, Mancos Mesa, Nokai Dome East and Grand Gulch) that are carried forward in the 2008 Monticello Approved RMP for protection of their wilderness characteristics. Mancos Mesa, Nokai Dome East and Grand Gulch are unavailable for oil and gas leasing. Dark Canyon is available subject to a no surface occupancy stipulation that cannot be waived, excepted or modified. All 48,400 acres acres are managed as avoidance areas for rights-of-way (ROW).

*See: Bears Ears_Existing Special Areas Calculations.pdf and
MtFORMP_Existing_Special_Designations_BLM.pdf*

2) Outstanding R.S. 2477 claims within a monument – type of road claimed and history

- a) There are 1,703 roads claimed in San Juan county under R.S. 2477. This figure also includes lands outside of BENM managed by the Monticello Field Office. (*See: Statewide_RS2477_Claims_102313.pdf and Utah_RS2477Claims.pdf*).

Note: Between 2005 and 2012, the State of Utah and 22 counties filed 30 lawsuits seeking quiet title to over 12,000 claimed R.S. 2477 rights-of-way. The vast majority of these claims are on BLM-administered lands, but claims are pending on lands administered by the National Park Service and U.S. Forest Service. To date, only one case, involving three roads, has been settled (Juab 1). Under a case management order, six cases involving 1,500 claims are currently being litigated – Kane (1), Kane (2), (3), and (4), and Garfield (1) and (2); these cases do not include lands within BENM. The remaining cases have been stayed, although preservation depositions have been allowed to continue. BLM-Utah maintains thousands of records related to R.S. 2477 claims and active or pending litigation, but some of the information is attorney-client privileged.

Please clarify if additional information is needed.

3) Maps –

- a) BENM provided several maps in the initial data response (*BENM WO 410 Checklist and Supporting Docs subfolder: BENM_GeoPDF_map.pdf and BENM_webmap.pdf*). There are also numerous maps contained within the Monticello Management Plan. We are attaching several maps of cultural and paleontological resources, which may also assist WO 410 in responding to other questions within this document. (1. *ArchaeologicalSurveysMap_UDSH.pdf*; 2. *ArchySiteDensityMap_UDSH.pdf*; 3. *DRAFT Monticello FO Cultural Predictive Model Map_BLM.pdf*; 4. *BearsEarsSites_Comparison_UDSH.pdf* and 5. *BearsEars_BriefingMap_031417_Paleo_BLM.pdf*)

Please advise if specific additional maps are needed.

4) Cultural or historical resources, particularly Tribal, located near a monument but not within the boundary that might benefit from inclusion in the monument

- a) Please refer to the *2.g.Bears-Ears-Inter-Tribal-Coalition-Proposal.pdf* in Drive, which describes the Coalitions' proposed boundaries and significance of areas in San Juan county. The Executive Summary for the Bears Ears Inter-Tribal Coalition (*ExecutiveSummaryBearsEarsProposal(BEITwebsite).pdf*) is attached. The attached *BENM Boundary Comparison Map Web.pdf* shows the extent of the Inter-tribal Coalition proposal as well as the Proclamation boundary (and the Utah Public Land Initiative designations). See also *TribalLettersPostDesignation.pdf*.

5) Other – general questions or comments

- a) **Discuss the full range of Proclamation objects.** The initial DOI data call focuses almost exclusively on cultural objects, but the Proclamation identifies many objects of antiquity or historical or scientific interest to be protected, such as paleontological resources.

- b) **Minor boundary modifications:** There are a few locations where a very small boundary modification would improve manageability of resources without causing any impacts to the objects identified in the Proclamation. For example, a portion of the Bluff Airport is included within the BENM. Tyler Ashcroft and Don Hoffheins can provide additional information on request.
- c) **Protection under the Antiquities Act versus other statutory laws or an NCA designation:** BLM-Utah requests that WO 410 assist in crafting clear language that describes the various levels of protection afforded under the Archeological Resources Protection Act, Paleontological Resources Protection Act, Native American Graves Protection and Repatriation Act, etc. versus the Antiquities Act. For example, there are no statutory protections for cultural landscapes, but such resources could be protected under the Antiquities Act. See also the *Stegner Center_NM vs NCA.pdf*.

Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

1. Documents Requested

a. Resource Management Plans/Land Use Plans

- i. Bears Ears National Monument (BENM) has not yet initiated a Monument Management Plan (MMP). The 2008 Monticello RMP will be followed in the interim. The entire Monticello RMP (DEIS/FEIS/ROD) can be accessed here: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=68097&dctmId=0b0003e880befb7c>. A copy of the 5-year RMP Evaluation is also in this folder (1.a.Monticello_RMP_Evaluation_September_2015.pdf).

b. Record of Decision

- i. BENM has not yet initiated a Monument Management Plan. The 2008 Monticello RMP will be followed in the interim. The ROD is in this folder (1.b.Monticello_Final_Plan_ROD.pdf) and can be accessed here: https://eplanning.blm.gov/epl-front-office/projects/lup/68097/85493/102694/Monticello_Final_Plan.pdf. Approximately 1,000 acres of BENM is within the Moab Field Office. The Moab RMP is located here: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=66098&dctmId=0b0003e880bf5947>

c. Public Scoping Documents

- i. Public scoping has not yet been initiated for a BENM MMP. The first public comment period post- designation associated with BENM is the DOI Notice of Opportunity for Public Comment.

d. Presidential Proclamation

- i. Proclamation 9558 of December 28, 2016 is in this folder (1.d.Bears Ears Presidential Proclamation.pdf).

2. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present** (Designation date for BENM is December 28, 2016 - information is not yet available for most of FY17)

a. Recreation - annual visits to site

- i. The BLM uses the Recreation Management Information System (RMIS) to report visitor use. Full reporting for annual visitation 2017 will not be available until the end of September.
- ii. Specific visitation information to the BENM is not available at this time. The

Monticello Field Office confirms that:

- Requests for overnight reservations in the Cedar Mesa area and day use permits for the Mcloyd Canyon/Moonhouse area, which are both popular recreation spots within the BENM, have increased since monument designation.
- Campgrounds in the Moab and Monticello Field Offices have remained full through much of this spring season, even on non-weekend days, and the number of overnight visitors is higher compared to this same time last year.

Detailed visitor data for the Monticello Field Office is available in this folder (2.a.RMISData_SelectInfo_2012_2016.pdf).

- iv. The number of recorded visitors to the Kane Gulch ranger station during the months of March and April was higher than in previous years. Included below are visitor numbers from the Kane Gulch ranger station.
 - 2013 - 3,484 visitors
 - 2014 - 3,730 visitors
 - 2015 - 4,344 visitors
 - 2016 - 4,848 visitors
 - 2017 - 6,535 visitors

b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

- i. There are no producing oil and gas wells and no coal developments in BENM. While public lands in the monument are now withdrawn from mineral leasing, valid existing rights were protected under the proclamation. Therefore, development on existing leases could occur.
- ii. There are 25 authorized federal oil and gas leases (29,416 acres) that are partially or wholly contained within the area that is now the BENM. The effective date on these leases ranges from 1972-2012. There are no authorized or pending APDs associated with these leases.
- iii. Since 1920, 250 wells have been drilled in the BENM. The last wells were drilled in 1993. Of the 250 wells drilled, three wells have produced economical quantities of oil and gas. The last producing well was drilled in 1984.
- iv. Since designation of the BENM, there has been no new construction of energy transmission infrastructure.

c. Minerals - annual mineral production on site

- i. There are no active mining operations in the BENM. There is one commercial mineral materials site. The permit for this site was renewed on March 13, 2016,

for a 10-year period. Production over the next 10 years is limited to 200,000 cubic yards (cu yds) at a rate of \$1.08 per cu yd. Due to the short timeframe since designation (five months), it is not possible to calculate the annual mineral production since designation.

- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - Timber production in the BENM is limited to non-commercial Christmas tree cutting permits, and permits for the collection of wood products (i.e., posts and firewood). Due to the short timeframe since designation (five months), it is not possible to calculate the annual timber production since designation. Collection of forest products, and firewood for personal noncommercial use is allowed under the monument proclamation.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
 - i. There are 20 allotments wholly or partially contained within BENM. These allotments include 50,469 permitted Animal Unit Months (AUMs). Allotment boundaries do not coincide with the BENM boundary, and therefore it is not possible to calculate the number of AUMs currently permitted within the monument. Due to the short timeframe since designation (five months), it is not possible to calculate the annual AUMs sold.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. Subsistence activities are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. BENM does provide for the collection of certain natural materials, including firewood by Native American Indians, under BLM permit. Information regarding firewood collection is included under the discussion of timber production.
 - ii. RMIS data provides the number of permitted/guided and recreational hunting activities and fishing activities (BENM_5YearRecreationData). These numbers do not reflect the actual number of licensed hunters/fishermen. That data is available from the State of Utah Division of Wildlife Resources. The entire BENM is open for hunting and fishing, which is regulated by the State of Utah Division of Wildlife Resources.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available

- i. The Bears Ears Inter-Tribal Coalition requested designation of the BENM. The Inter-Tribal Coalition, which includes the Hopi, Zuni Tribe, Navajo Nation, Ute Mountain Ute, and Northern Ute, have stated that the entire 1.35 million-acre BENM includes important cultural values. The importance of these values, which was recognized in the monument proclamation, are discussed in the Inter-Tribal Coalitions monument proposal. (2.g.Bears-Ears-Inter-Tribal-Coalition-Proposal.pdf), which was submitted to the department on Oct. 15, 2015. The cultural values of the area are also explained in the proclamation.
- ii. Tribes use the BENM for ceremonies and to visit sacred sites. Traditions of hunting, fishing, gathering, and wood cutting are still practiced by tribal members, as is collection of medicinal and ceremonial plants, edible herbs, and materials for crafting items like baskets and footwear. The BLM issues free use permits for collection of materials for ceremonial purposes.
- iii. According to the Utah State Historic Preservation Office (SHPO), as of Feb. 6, 2017, there are 8,480 recorded archaeological sites and four archaeological districts within BENM. According to the National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties, a “district” is a grouping of sites, buildings, structures, or objects that are linked historically by function, theme, or physical development or aesthetically by plan. The following archaeological districts are either completely within or partially within the BENM: Butler Wash, Grand Gulch, Natural Bridges, and the Salt Creek Archaeological District.
- iv. More than 70 percent of these sites are prehistoric (pre-dating the 1800s). These prehistoric sites include pottery and stone tool (lithic) scatters, the remains of cooking features (hearths), storage features such as adobe granaries and subsurface stone lined granaries, prehistoric roads, petroglyphs, pictographs and cliff dwellings. Historic sites include historic debris scatters, roads, fences, uranium and vanadium mines from World War II and the Cold War.
- v. The BLM has not completely surveyed the monument. The total percentage of the BENM that has been surveyed for cultural resources is 9.2 percent.

3. Information on activities occurring during the **5 years prior to designation**

- a. Recreation - annual visits to site
 - i. The BLM uses the RMIS to report visitor use. BENM is a subset of the Monticello Field Office. RMIS data for the Monticello Field Office is included in the folder (2.a.RMISData_SelectInfo_2012_2016.pdf).
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

- i. There was no energy production from coal, oil, gas, or renewables during the five years prior to designation (2012-2016). The last producing oil and gas well was drilled in 1984. The last well was drilled in 1993.
 - ii. No energy transmission infrastructure was constructed within the BENM during the five years prior to designation. There are 13 existing power transmission lines that intersect the BENM. These lines were constructed from 1969-1984. There are four oil and gas pipelines or related facilities that were constructed in 1963. Additional information on energy transmission infrastructure and other lands and realty actions is attached (3.b.Lands_and_Realty.pdf).
- c. Minerals - annual mineral production on site
- i. During the five years prior to designation, mineral production was limited to one mineral material site. The permit for this site was renewed on March 13, 2016, for 10 years. Production over the next 10 years is limited to 200,000 cubic yards (cu yds) at a rate of \$1.08 per cu yd. Production numbers for the past five years are included below. This production occurred at a rate of .90 cents per cu yd.
 - 2011- 16,000 cu yds
 - 2012- 12,000 cu yds
 - 2013- 31,622 cu yds
 - 2014- 44,444 cu yds
 - 2015- 2,914 cu yds
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
- i. During the five years prior to designation, timber production in the BENM was limited to non-commercial Christmas tree permits, and permits for the collection of wood products (i.e., posts and firewood). Production information for the site can be found the folder (3.d.Timber_Production_2012_2016). Information provided is for the entire field office and is not limited to the area that now part of the BENM. The BLM does collect location information.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
- i. There are 20 allotments wholly or partially contained within BENM. These allotments include 50,469 permitted AUMs. Allotment boundaries do not coincide with the BENM boundary, and therefore it is not possible to calculate the number of AUMs currently permitted within the monument boundary. AUMs sold during the past five years are included below.
 - 2012- 27,836 AUMs
 - 2013- 29,175 AUMs
 - 2014- 32,193 AUMs
 - 2015- 32,129 AUMs

- 2016- 36,402 AUMs
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. As previously mentioned, subsistence activities are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. BENM does provide for the collection of certain natural materials, including firewood by Native American Indians, under BLM permit. Permits issued to American Indians for collection are accounted for in the annual timber production numbers.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. See response to 2.g.

4. Information on activities that likely would have occurred annually from the date of designation to the present **if the Monument had not been designated**

The answer to this question would be highly speculative. The question is best answered with qualitative (rather than quantitative) data. As BENM was designated less than five months ago, there has been very little change in the management of activities since the date of designation.

- a. Recreation - annual visits to site
 - i. Visitation numbers collected by the Monticello Field Office indicate that visitation in the area that is now designated as Bears Ears National Monument (2.a.RMISData_SelectInfo_2012_2016.pdf) has been steadily increasing. This is consistent with visitation increases also seen in Natural Bridges National Monument and the Needles District of Canyonlands National Park, which can only be accessed by traveling through the BENM.
 - ii. The BLM uses the RMIS to report visitor use. Full reporting for annual visitation 2017 will not be available until the end of September.
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
 - i. Due to the short timeframe since designation, it is unlikely that any activities resulting in production of coal, oil, gas, or renewable energies would have occurred from the date of designation to present.
 - ii. A cursory review of mineral potential is included in the Drive folder (4.c.d.Cursory Review of the Mineral Potential Occurrence within the Bears Ears

NM_BLM and 4.c.d.EnergyDevMap_BENM_UDSH).

- iii. There are 25 authorized federal oil and gas leases (29,416 acres) that are partially or wholly contained within the area that is now the BENM. The effective date on these leases ranges from 1972-2012. There are no authorized or pending Applications for a Permit to Drill (APDs) associated with these leases.
- iv. According to BLM GIS data, there have been approximately 63,657 acres nominated for leasing in the BENM area since 2014. The BLM does not have GIS data for nominations prior to this date. In addition, expressions of interest were considered confidential prior to Jan. 1, 2014. Prior to designation, these leases were deferred because of existing land use plan decisions, cultural resource concerns, or at the State Director's discretion. All nominated parcels that were deferred were within the planning area for the proposed San Juan Master Leasing Plan.
- v. Due to the short timeframe since designation, it is unlikely that any activities resulting in development of new energy transmission infrastructure would have occurred from the date of designation to present. Prior to designation, there were no pending applications for construction of new energy transmission infrastructure or proposed energy developments.

c. Minerals - annual mineral production on site

- i. Due to the short timeframe since designation, it is unlikely that any additional mineral production would have occurred from the date of designation to present because there were no pending applications or permits.
- ii. A cursory review of mineral potential is included in the Drive folder (4.c.d.Cursory Review of the Mineral Potential Occurrence within the Bears Ears NM_BLM and 4.c.d.EnergyDevMap_BENM_UDSH).
- iii. Portions of the BENM have potash development potential and historically there have been potash prospecting applications in the area. However, land use planning decisions made prior to the designation of BENM preclude processing of those applications.

d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)

- i. The BLM does not have sufficient information to determine how designation of the BENM has impacted timber production (i.e., Christmas tree cutting, wood post cutting, or firewood collection). However, under the monument proclamation these uses are allowed to continue. Therefore, it is unlikely that designation of the monument has impacted timber production.

e. Grazing - annual grazing on site (AUMs permitted and sold)

- i. Designation of the monument has not changed the number of permitted AUMs.

The BLM does not have sufficient information to determine how designation of the BENM has impacted the number of AUMs sold. However, under the monument proclamation, grazing is allowed to continue, subject to laws, regulations, and policies followed by U.S. Forest Service (USFS) or the BLM in issuing and administering grazing permits or leases.

- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. The BLM does not have sufficient information to predict how designation of the monument has impacted participation rates in subsistence activities.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. The BLM does not have sufficient information to predict how designation of the monument has impacted cultural uses of the monument. However, the monument proclamation requires that the BLM and USFS provide access by members of Indian tribes for traditional cultural and customary uses, consistent with the American Indian Religious Freedom Act (42 U.S.C. 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites).

5. Changes to boundaries - dates and changes in size

- i. There have been no changes to boundaries.

6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment

- i. The public process preceding BENM designation is outlined in the document 6.Bears Ears Fact Facts QA.pdf (released with the DOI/USDA joint press release on 12/28/16) in this folder. Secretary Jewell held a public meeting in Bluff, Utah in July 2016. See also: <https://www.doi.gov/pressreleases/secretary-jewell-under-secretary-bonnie-join-utah-local-leaders-public-meeting-hear>.

7. Terms of Designation

- i. Refer to Proclamation for the terms of designation. No additional background (e.g., legislated land exchanges or Congressional budget provisions, etc.).

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- a) **Discuss the full range of Proclamation objects.** The initial DOI data call focuses almost exclusively on cultural objects, but the Proclamation identifies many objects of antiquity or historical or scientific interest to be protected, such as paleontological resources.

- b) **Minor boundary modifications:** There are a few locations where a very small boundary modification would improve manageability of resources without causing any impacts to the objects identified in the Proclamation. For example, a portion of the Bluff Airport is included within the BENM. Tyler Ashcroft and Don Hoffheins can provide additional information on request.
- c) **Protection under the Antiquities Act versus other statutory laws or an NCA designation:** BLM-Utah requests that WO 410 assist in crafting clear language that describes the various levels of protection afforded under the Archeological Resources Protection Act, Paleontological Resources Protection Act, Native American Graves Protection and Repatriation Act, etc. versus the Antiquities Act. For example, there are no statutory protections for cultural landscapes, but such resources could be protected under the Antiquities Act. See also the *Stegner Center_NM vs NCA.pdf*.